

REMARKS/ARGUMENTS

Status of the Claims

Before this Amendment, claims 1 – 5, 7, 8, 11, 13, 14, 17, 29, and 31 – 33 were present for examination. Claims 1, 11, and 29 are amended. No claims are canceled, and no new claims are added. Therefore, claims 1 – 5, 7, 8, 11, 13, 14, 17, 29, and 31 – 33 are present for examination, and claims 1, 11, and 29 are the independent claims. No new matter is added by these amendments. Applicants respectfully request reconsideration of this application as amended.

The Office Action dated January 6, 2010 ("Office Action") rejected claims 1 – 5, 7 – 9, 11, 13 – 14, 17, 29, and 31 – 33 under 103(a) as being unpatentable over the cited portions of Coffee et al., U.S. Publication No. 2006/0182055 ("Coffee"), in view of the cited portions of Ohto et al., U.S. Patent No. 7,119,831 ("Ohto"). Applicants respectfully request reconsideration for the reasons that follow.

35 U.S.C. §103 Rejections

The Office Action rejected independent claims 1, 11, and 29 under 35 U.S.C. §103 as being unpatentable over Coffee, in view of Ohto. To establish a *prima facie* case of obviousness, the cited references, combined with the knowledge of those of ordinary skill in the art, must teach or suggest all the claim limitations. Applicants respectfully traverse this rejection at least because the combination of Coffee, Ohto, and ordinary knowledge in the art fails to teach or suggest all the recitations of claims 1, 11, and 29.

Claim1

Claim 1 recites, among other things: (1) "a plurality of telecommunications plant equipment, each telecommunications plant equipment being part of an access network and having: ... a set of equipment characteristics comprising information about the telecommunications plant equipment relevant to servicing of the telecommunications plant equipment"; and (2) "each telecommunications plant equipment being part of an access network

and having: a first location sensor configured to provide a first location associated with the telecommunications plant equipment..., the first location sensor being installed at and associated with the telecommunications plant equipment and configured to report the first location to the network engineering center via the service network.”

Regarding the first enumerated recitation, the Office Action apparently cites only Coffee at ¶¶ [0289] and [0568]. Applicants are unable to find any teaching or suggestion in Coffee of telecommunications plant equipment at all, let alone of telecommunications plant equipment being part of an access network and having equipment characteristics comprising information about the telecommunications plant equipment relevant to servicing of the telecommunications plant equipment, as recited in claim 1. Further, the Office Action cites no other teachings from other art, and Applicants are unable to find other teachings in the cited art, of telecommunications plant equipment.

Regarding the second enumerated recitation, the Office Action correctly admits that the “first location sensor” is not taught by Coffee, and instead relies on Ohto (at Col. 2, ll. 40 – 47; Col. 10, ln. 62 – Col. 11, ln. 8; Figs. 3 and 13). Office Action, p. 3. Ohto apparently describes a camera with an integrated location sensor. The camera detects objects in the currently viewed scene, registers their location (via GPS) with a database of known landmarks (e.g., buildings) in those locations, and overlays the scene in the camera’s viewfinder with information about those landmarks.

First, Ohto apparently says nothing of telecommunications plant equipment or related location information. Ohto seems to rely on landmark objects being relatively large and having relative locations and shapes to nearby objects to allow rendering within a larger scene. It would be unreasonable to apply these techniques to finding typical types of telecommunications plant equipment. Second, even if Ohto were broadly construed to include telecommunications plant equipment, the location sensor is neither (a) “installed at and associated with the telecommunications plant equipment” or (b) “configured to report the first location to the network engineering center via the service network,” as recited in claim 1, as amended.

For at least these reasons, the cited art cannot be relied upon, alone or in combination, to teach or suggest all the recitations of claim 1.

Claim 11

Claim 11 recites, among other things: (1) “determining an installation location at the telecommunications plant equipment having a relatively high global positioning system (GPS) signal strength with respect to other locations at the telecommunications plant equipment”; (2) “installing a GPS location system at the installation location”; and (3) “receiving a third location defining a location of the telecommunications plant equipment from the GPS location system.” Applicants respectfully note that the Office Action does not provide any cited art to teach or suggest these or similar recitations. Further, Applicants are unable to find any teaching or suggestion of these recitations in the cited art.

For at least these reasons, the cited art cannot be relied upon, alone or in combination, to teach or suggest all the recitations of claim 11.

Claim 29

Claim 29 recites, among other things: “each telecommunications plant equipment being associated with a location and a set of equipment characteristics comprising information about the telecommunications plant equipment relevant to servicing of the telecommunications plant equipment, the location associated with each telecommunications plant equipment being determined by a location sensor being installed at and associated with the telecommunications plant equipment and configured to remotely report the location to the central monitor.” As discussed above with reference to claim 1, the cited art apparently fails to teach or suggest either the type of telecommunications plant equipment or the type of location sensing of the telecommunications plant equipment recited in the claims.

For at least these reasons, the cited art cannot be relied upon, alone or in combination, to teach or suggest all the recitations of claim 29.

Dependent Claims

As discussed above, both Coffee and Ohto fail to teach or suggest the recitations of independent claims 1, 11, and 29. Further, the Office Action does not provide any teaching from other art or reason why these recitations would be within the knowledge of a person of ordinary skill in the art. As such, the combined teachings of the art, as cited by the Office Action, fail to establish a *prima facie* case of obviousness as to the independent claims. Moreover, claims 2 –5, 7 – 9, 13 – 14, 17, and 31 – 33 are believed allowable at least for reasons of their dependence from allowable base claims.

Applicants, therefore, respectfully request that the §103 rejections to all the claims be withdrawn.

CONCLUSION

In view of the foregoing, Applicants believe all claims now pending in this Application are in condition for allowance. The issuance of a formal Notice of Allowance at an early date is respectfully requested.

If the Examiner believes a telephone conference would expedite prosecution of this application, please telephone the undersigned at 303-571-4000.

Respectfully submitted,

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